

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE BLUTSTEIN, CARTER, COULTER AND GRITZ PLAINTIFFS'
SECOND REQUEST TO PRODUCE DOCUMENTS AND THINGS**
(Nos. 11-20)

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Dr. Richard Blutstein, Dr. Katherine Baker, Rebekah Blutstein, Dr. Larry Carter, Shaun Coffel, Robert L. Coulter, Sr., Dianne Coulter Miller, Robert L. Coulter, Jr., Norman Gritz and Nevenka Gritz ("Plaintiffs"), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs' counsel within 30 days of the service of these requests.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

SPECIFIC DEFINITIONS

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

13. The "Terrorist Attack" means and refers to the July 31, 2002, terrorist bombing attack from which the Plaintiffs' action arises.

REQUESTS FOR DOCUMENTS AND THINGS

11. All documents concerning the Terrorist Attack, including without limitation:
- a. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PSS.
 - b. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the GIS.
 - c. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the NSF.
 - d. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the MI.
 - e. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of Force 17.
 - f. All documents concerning the Terrorist Attack in the paper, computerized, electronic or other files or archives of the PAP.
12. The following documents concerning Marwan Barghouti:
- a. The complete personnel files for Marwan Barghouti from all positions and jobs held by Marwan Barghouti in the PA and/or PLO and from all work and employment performed by Marwan Barghouti for the PA and/or PLO, at any time.
 - b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Marwan Barghouti in the PA and/or PLO and of all work and employment performed by Marwan Barghouti for the PA and/or PLO,

between January 1, 2000 and today; (ii); the rank or ranks held by Marwan Barghouti between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Marwan Barghouti held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Marwan Barghouti between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Marwan Barghouti and/ Marwan Barghouti's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Marwan Barghouti's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Marwan Barghouti.

e. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the PAP.

13. All documents concerning Ahmed Taleb Mustapha Barghouti ("Ahmed Barghouti"), including without limitation:

- a. The complete personnel files for Ahmed Barghouti from all positions and jobs held by Ahmed Barghouti in the PA and/or PLO and from all work and employment performed by Ahmed Barghouti for the PA and/or PLO, at any time.
- b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Ahmed Barghouti in the PA and/or PLO and of all work and employment performed by Ahmed Barghouti for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Ahmed Barghouti between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Ahmed Barghouti held and provided such positions, jobs, work and employment.
- c. All documents concerning all payments made by the PA and/or PLO to Ahmed Barghouti between January 1, 2000 and today.
- d. All documents concerning all payments made and all benefits provided to Ahmed Barghouti and/or Ahmed Barghouti's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Ahmed Barghouti's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Ahmed Barghouti.
- e. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of the PSS.
- f. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Ahmed Barghouti in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Ahmed Barghouti.

14. All documents concerning Abdullah Barghouti including without limitation:

a. The complete personnel files for Abdullah Barghouti from all positions and jobs held by Abdullah Barghouti in the PA and/or PLO and from all work and employment performed by Abdullah Barghouti for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Abdullah Barghouti in the PA and/or PLO and of all work and employment performed by Abdullah Barghouti for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Abdullah Barghouti between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Abdullah Barghouti held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Abdullah Barghouti between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Abdullah Barghouti and/or Abdullah Barghouti's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Abdullah Barghouti's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Abdullah Barghouti.

e. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Abdullah Barghouti in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Abdullah Barghouti.

15. All documents concerning Ibrahim Hamed ("Hamed"), including without limitation:

a. The complete personnel files for Hamed from all positions and jobs held by Hamed in the PA and/or PLO and from all work and employment performed by Hamed for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Hamed in the PA and/or PLO and of all work and employment performed by Hamed for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Hamed between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Hamed held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Hamed between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Hamed and/or Hamed's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Hamed's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Hamed.

e. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Hamed in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Hamed.

16. All documents concerning Mohammed Hassan Ahmed Arman ("Arman"), including without limitation:

a. The complete personnel files for Arman from all positions and jobs held by Arman in the PA and/or PLO and from all work and employment performed by Arman for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Arman in the PA and/or PLO and of all work and employment performed by Arman for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Arman between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Arman held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Arman between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Arman and/or Arman's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Arman's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Arman.

e. All documents concerning Arman in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Arman in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Arman in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Arman in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Arman in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Arman in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Arman.

17. All documents concerning Wael Mahmoud Mohammed-Ali Qasam ("Qasam"), including without limitation:

a. The complete personnel files for Qasam from all positions and jobs held by Qasam in the PA and/or PLO and from all work and employment performed by Qasam for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Qasam in the PA and/or PLO and of all work and employment performed by Qasam for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Qasam between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Qasam held and provided such positions, jobs, work and employment.

- c. All documents concerning all payments made by the PA and/or PLO to Qasam between January 1, 2000 and today.
 - d. All documents concerning all payments made and all benefits provided to Qasam and/or Qasam's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Qasam's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Qasam.
 - e. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of the PSS.
 - f. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of the GIS.
 - g. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of the NSF.
 - h. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of the MI.
 - i. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of Force 17.
 - j. All documents concerning Qasam in the paper, computerized, electronic or other files or archives of the PAP.
 - k. All broadcasts on PA TV concerning Qasam.
18. All documents concerning Walid Abdel Aziz Abdel Hadi Anjas ("Anjas"), including without limitation:

a. The complete personnel files for Anjas from all positions and jobs held by Anjas in the PA and/or PLO and from all work and employment performed by Anjas for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Anjas in the PA and/or PLO and of all work and employment performed by Anjas for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Anjas between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Anjas held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Anjas between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Anjas and/or Anjas's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Anjas's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Anjas.

e. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Anjas in the paper, computerized, electronic or other files or archives of the PAP.

k. All broadcasts on PA TV concerning Anjas.

19. All documents concerning Mohammed Aschak Odeh ("Odeh"), including without limitation:

a. The complete personnel files for Odeh from all positions and jobs held by Odeh in the PA and/or PLO and from all work and employment performed by Odeh for the PA and/or PLO, at any time.

b. All documents concerning: (i) the titles, nature, purposes, responsibilities and duties of all positions and jobs held by Odeh in the PA and/or PLO and of all work and employment performed by Odeh for the PA and/or PLO, between January 1, 2000 and today; (ii); the rank or ranks held by Odeh between January 1, 2000 and today, in all such positions, jobs, work and employment; and (iii) the specific time periods during which Odeh held and provided such positions, jobs, work and employment.

c. All documents concerning all payments made by the PA and/or PLO to Odeh between January 1, 2000 and today.

d. All documents concerning all payments made and all benefits provided to Odeh and/or Odeh's relatives by the PA and/or PLO at any time after the Terrorist Attack, in relation to, as a result of and/or due to Odeh's imprisonment by Israeli authorities, including without limitation the PA Prisoner Form and File for Odeh.

k. All broadcasts on PA TV concerning Abbasi, including without limitation a complete copy of the broadcast portions of which were contained in the audiovisual file disclosed to defendants by plaintiffs by email on October 23, 2012 at 6:08 AM.

November 21, 2012

Plaintiffs, by their Attorney,



Robert J. Tolchin
111 Livingston Street, Suite 1928
Brooklyn, New York 11201
(718) 855-3627
Fax: (718) 504-4943
RJT@tolchinlaw.com

David I. Schoen
David I. Schoen, Attorney at Law
2800 Zelda Road, Suite 100-6
Montgomery, Alabama 36106
(334) 395-6611
DSchoen593@aol.com

CERTIFICATION

I hereby certify that on November 21, 2012, I caused the within to be served by electronic mail and by hand on the counsel listed below:

Brian A. Hill
MILLER & CHEVALIER CHARTERED
655 15th Street, NW, Suite 900
Washington D.C. 20005-6701


Robert J. Tolchin